

Mr. Bradshaw

INDUSTRY CIRCULAR

OFFICE OF THE COMMISSIONER OF INTERNAL REVENUE
ALCOHOL AND TOBACCO TAX DIVISION



WASHINGTON 25, D. C.

Industry Circular No. 60-45

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WHOLESALE LIQUOR DEALERS' RECORDS AND REPORTS

Wholesale dealers in liquors
and others concerned:

Purpose. This industry circular is to remind you of the record-keeping requirements of 26 CFR Part 194 in respect of the showing of serial numbers of cases of distilled spirits on your records of receipt and disposition.

Background. We have received information indicating that some wholesale liquor dealers may have concluded that they may be relieved from the requirements of 26 CFR 194.225 and 194.226 in respect of entering the serial numbers of cases on their records showing the receipt and disposition of distilled spirits. This erroneous conclusion is apparently based on a misunderstanding of 26 CFR 194.237, which contemplates that assistant regional commissioners may specifically authorize wholesalers to omit such serial numbers from their reports on Forms 52A and 52B.

Comment. The regulatory requirements for preparing and submitting reports are separate from and in addition to the requirements for preparing and maintaining records. It should be noted that Forms 52A and 52B are prescribed report forms but that there are no prescribed forms for the records required by 26 CFR 194.225 and 194.226.

Therefore, the fact that your assistant regional commissioner may have authorized you to omit case serial numbers from your reports (Forms 52A and 52B) does not excuse you from entering such serial numbers in your records.

Inquiries. Inquiries about this circular should refer to its number and be addressed to your assistant regional commissioner (alcohol and tobacco tax).

Dwight E. Avis

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Director, Alcohol and Tobacco Tax Division